

APPENDIX “B”

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO.,
GEICO INDEMNITY CO., GEICO GENERAL
INSURANCE COMPANY and GEICO
CASUALTY CO.,

Docket No.:
15-cv-7236 (ERK)(RML)

Plaintiffs,

-against-

BRUCE JACOBSON, D.C., et al.,

Defendants.

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PLAINTIFFS PROPOSED VOIR DIRE QUESTIONS

1. Do you know anyone who is employed by GEICO?
 - a. If so, how long have you known them and what is your understanding of what they do for the Company.
2. Do you know or are you familiar with any of the Defendants in this case, including the individuals and the companies?
 - a. If so, how long have you known or been familiar with them and what type of relationship (if any) do you have with any of them.
3. Do you know or are you familiar with any of the locations that I have identified to you?
 - a. If so, under what circumstances did the location become known to you?
4. Without telling us your address, can you tell us what neighborhood or town you live in and for how long?
5. What kind of work do you currently do and for how long?
 - a. If you are retired or not currently working, what was the last type of work that you did and for how long?
6. Have you ever done any freelance/consulting work?

- a. If so, what type and for how long?
7. What was the highest level of school that you reached?
 - a. Do you have any degrees?
 - b. If so, from where and in what?
8. Are you married?
 - a. If so, what kind of work does/did your spouse do?
9. Do you have children?
 - a. If so, what do they do for a living?
10. Have you or anyone in your family ever worked for an insurance company?
 - a. If so, for which insurance Company, for how long and in what capacity.
11. Have you or anyone in your family ever worked in the healthcare industry, either as a licensed professional (physicians, chiropractors, nurses), or in some other capacity (e.g. billing or administration)?
 - a. If so, for whom, for how long and in what capacity?
12. Have you or any member of your family ever been treated by a chiropractor?
 - a. If so, what type of care was provided to you or your family member and for how long?
13. Do you have any friends or acquaintances who are chiropractors?
 - a. If so, have they ever shared with you any information that would relate the care they provide to people or what they are paid for their services.
14. Do you have any general thoughts or opinions about chiropractors and the services that they provide?
15. What are your hobbies and interests? What do you like to do in your spare time?
16. Do you often read any newspapers or magazines, or visit any particular websites?
 - a. If so, what do you typically read and/or which websites do you view?
17. Do you watch any particular television shows?

- a. If so, which ones?
- 18. Do you belong to any organizations (e.g., unions, community groups, etc...)?
 - a. If so, which ones and for how long?
- 19. Are you a licensed driver?
- 20. Have you ever been in an automobile accident?
 - a. If so, when and what generally were the circumstances?
 - b. Did you make a claim to an insurance company seeking medical benefits?
 - c. What was the outcome of the claim?
- 21. Have you or any member of your family ever had any difficulty with an insurance claim that has made?
 - a. If so, when and what generally were the circumstances?
- 22. Do you have any general thoughts or opinions about insurance companies and the services that they provide?
- 23. The plaintiffs in this case are the GEICO insurance companies.
 - a. Are you insured by GEICO? If so, for how long?
 - b. Have you ever interacted with GEICO in any way? If so, what were the circumstances?
- 24. Have you ever been involved in a lawsuit, as a party, witness, or juror? What were the circumstances of the case?
- 25. More specifically, have you or any member of your family ever been a plaintiff or a defendant in a personal injury action or a plaintiff in a lawsuit against an insurance company? If so, how did it end?
- 26. Have you ever experienced a bad outcome as a result of being treated by a chiropractor and/or physician?
- 27. Do you have any opinions as to the amount that health care professionals charge for their services? If so, what are they?
- 28. Have you or anyone in your family ever declared bankruptcy?
- 29. The plaintiffs are insurance companies. Under the law, insurance companies are entitled to be treated the same as anyone else and are entitled to be treated the same as a private individual. Would you have any difficulty in accepting that principle?

30. If a plaintiff, whether a corporation or an individual, proves its case, would you have any problem in returning a verdict in favor of the plaintiff even if you felt sympathetic for the defendant or disagreed with the law?
31. Would you have any problem awarding a company a large amount of money in damages if the company proves its case?
32. Is there anything else that might be a factor in your ability to be fair and impartial in this case based upon what you have learned?

Dated: August 10, 2021
Uniondale, New York

RIVKIN RADLER LLP

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